

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 1:21-CR-68
v.	§	Hon. Thad Heartfield
	§	
RION CARLOS	§	

**FACTUAL BASIS**

The defendant, **Rion Carlos**, stipulates and agrees that the following facts are true and correct:

1. The defendant, **Rion Carlos (Carlos)**, who is changing his plea to guilty, admits that he is the individual charged in the Indictment.
  
2. As charged in Count One of the Indictment, on or about January 31, 2020, **Carlos** knowingly transported by any means or facility of, or in or affecting, interstate or foreign commerce, including by computer, an item or items of child pornography; and when the defendant transported the item or items, defendant knew the items were child pornography.
  
3. The defendant, **Carlos**, admits he used a communications application, the Internet, and an Apple iPhone cellular phone to provide an individual with links to a cloud storage service that caused Provider 1 to transport over 300 images, but less than 600 images of child pornography including some images depicting a prepubescent minor, including the following visual depictions:

FILE IDENTIFIER	DESCRIPTION
o6x6svedqfm9qoi	This video file depicts an underaged female

	performing oral sex on a male penis
mii7cream	This video file depicts a pre-pubescent female naked from her waist down laying on her back legs spread with a male rubbing his penis against her genitalia.
liahee_2544	This video file depicts a pre-pubescent female naked from the waist down straddling a penis and then performing oral sex on a male penis

In violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1) & 2.

4. **Carlos** acknowledges that the Apple iPhone cellular phone is not manufactured in the United States and thus the device itself travelled in interstate and foreign commerce. **Carlos** acknowledged that the internet communication provider was not primarily managed in the United States, therefore, it was in or affecting interstate commerce.

5. When **Carlos** transported the items he knew the items were child pornography.

6. **Carlos** admits that this conduct occurred within the Eastern District of Texas.

#### DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

7. I have read this factual basis and stipulation and the indictment, or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and stipulation and agree without reservation that it accurately describes the events and my acts.

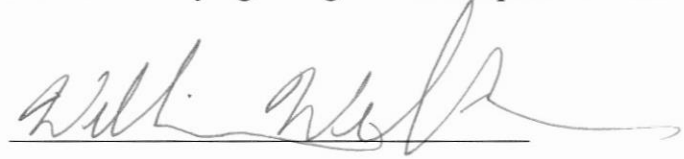
Dated: 10/1/21

  
\_\_\_\_\_  
**RION CARLOS**  
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT


8. I have read this factual basis and stipulation and the information and have reviewed them with my client, **RION CARLOS**. Based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis and stipulation as well as the indictment, and is knowingly and voluntarily agreeing to these stipulated facts.

Dated: 10/1/21

  
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**WILLIAM MARCUS WILKERSON**  
Attorney for the Defendant

Respectfully submitted,

**NICHOLAS J. GANJEI**  
**ACTING UNITED STATES ATTORNEY**

  
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